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May 23, 2023

VIA ECF

Honorable Jesse M. Furman
U.S. District Court for the Southern District of New York
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

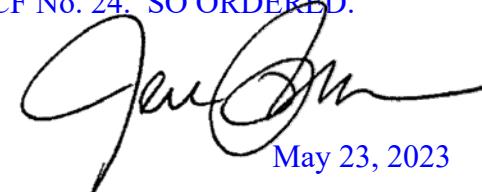
Re: Baptiste v. The Bank of New York Mellon, et al., Case No. 1:22-cv-08045

Dear Judge Furman:

We represent Defendants The Bank of New York Mellon and Brian Mauney in the above-referenced matter and write jointly with Plaintiff to request an amendment to the current discovery schedule as set forth below. This is the parties' first request for an extension of discovery. To date, the parties have been working cooperatively together to complete document productions, including from third parties, and to schedule depositions. In light of the remaining document production and depositions to be completed as well as contemplated expert discovery, the parties respectfully request the Court enter the following schedule:

Event	Current Deadline	Requested Deadline
Fact Discovery (ECF 22, ¶ 8(b))	May 26, 2023	July 25, 2023
Settlement Discussion Between Parties (¶ 12)	14 days following the close of fact discovery	14 days following the close of fact discovery
Expert discovery (¶ 8(d))	July 10, 2023	September 11, 2023
Summary Judgment Motions (¶ 13)	30 days from the close of expert discovery (July 10, 2023)	30 days from the close of expert discovery (September 11, 2023)
Joint Pretrial Order (¶14)	30 days from MSJ decision	30 days from MSJ decision

The Parties have also conferred regarding interim expert discovery deadlines as contemplated by Your Honor's Order. Thank you for your consideration, and the parties are available to answer any questions.



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Respectfully Submitted,

/s/ Gina F. McGuire

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cc: *Counsel of record (via ECF)*

SO ORDERED:

Jesse M. Furman
United States District Judge

DATED: _____